

COASTAL CONSERVANCY

Project Summary  
October 26, 2000

**SANTA CLARA RIVER PARKWAY CONCEPTUAL ENHANCEMENT PLAN**  
**CAMP ACQUISITION**

File No. 00-105  
Project Manager: Peter S. Brand

RECOMMENDED ACTION: Approval of the Santa Clara River Parkway Conceptual Enhancement Plan and authorization to disburse up to \$4.8 million to the Nature Conservancy for the acquisition of the Camp property, totaling 220 acres, to commence implementation of the Plan.

LOCATION: North bank of the Santa Clara River, east of the Highway 101 bridge, in Ventura County (Exhibit 1)

PROGRAM CATEGORY: Resource Enhancement

ESTIMATED COST: Coastal Conservancy \$4,800,000 \*

\* Source: 2000 Water Bond River Protection Program  
(Proposition 13)

PROJECT SUMMARY: Staff recommends that the Conservancy adopt a conceptual enhancement plan for the Santa Clara River Parkway and authorize disbursement of up to \$4.8 million to the Nature Conservancy for the acquisition of the Camp property, totaling 220 acres. Acquisition will preserve 70 acres of river and riparian habitat and allow for the restoration of an additional 150 acres of riparian habitat. It would be the first step in implementation of the Lower Santa Clara River Parkway Conceptual Enhancement Plan, which recommends acquisition of a continuous estuarine and riverine corridor along the Santa Clara River between the cities of Ventura and Oxnard for habitat preservation and to provide public trail linkages to and along the river and adjacent public lands. The Conservancy has an appraisal on the Camp property and a price to which the landowner has agreed. A grant to the Nature Conservancy will assist in expediting acquisition of the property. The area

currently in cultivation would be leased back until additional properties are acquired and restoration planning for the whole reach has been completed. Part of the restoration planning effort will be to provide for removal of the levee on the property, allowing the entire property to be restored as riparian habitat and reconnecting it to the river.

This project is the first in a series of proposed acquisitions leading to the creation of a 15-mile long park and wildlife preserve encompassing 6,400 acres and extending from the ocean to South Mountain. The Coastal Conservancy, working with river landowners and its local partners, has developed the acquisition and management concept of a Santa Clara River Parkway, an unprecedented opportunity for river restoration in southern California.

The Santa Clara River Parkway has two complimentary purposes: the acquisition and public management of the river corridor to allow for habitat restoration, flood management, public enjoyment, and environmental education; and the restoration of the natural processes of the river to prevent continued flood losses of habitat, farmland, and public facilities.

The initial focus of the Santa Clara River Parkway effort is on the lower Santa Clara River, which is home to seven endangered and two threatened species, and 13 other species or species groups of concern (Exhibit 3). More than any other section of the river, the lower river floodplain has been constrained and degraded by private levees, mining, and water facilities, reduced from its former vast extent. Typical of the historical destruction of habitat, the estuary, once 870 acres of wetlands, is now 133 acres.

Acquisition of this continuous estuarine and riverine corridor would result in the restoration of over a thousand acres of habitat that has been converted to other uses and would allow the river to return to its natural cycle of meander and braided flows, which is critical for the endangered fish species. The lower Santa Clara River is proposed by the National Marine Fisheries Service for listing as critical habitat for the southern steelhead. In addition to the steelhead, there are six species listed as threatened or endangered and thirteen other species of concern in the lower river alone. Enhancement of as much as 3,000 acres could revive a variety of decreasing coastal wetland types including estuarine intertidal and palustrine shrub and forested habitat as well as upland coastal sage scrub on South Mountain.

The Santa Clara River is the largest (100 miles in length with a watershed of 1,460 square miles) and one of the most significant rivers in southern California. Twenty-eight listed species and species of concern inhabit the river. The agricultural and scenic heritage along the river is also a very significant part of California history and will be partially preserved and protected by the River Parkway. The most dramatic part of the river's history, however, has been the flooding, from the St. Francis Dam Disaster to the devastating 1969 flood which wiped out crops and developed areas for approximately 50 miles. This river is naturally a highly dynamic system with extremely high winter flood flows but sedimentation and flooding are exacerbated by grazing and erosive agricultural practices, urban development, and aggregate mining. These land uses have reduced riparian habitat to a fraction of its former size at the same time that pollutants and concentrated flood flows have degraded the habitat that remains. However, the Santa Clara River is also unique in southern California in that most of the riverine areas that have been converted to other uses could still be restored as habitat.

Once whole reaches of the river have been acquired, private levees can be removed obviating the pressure for pilot channels, resolving longstanding regulatory battles, and reducing most of the future costs of flood damage to farms and public facilities. Reestablishment of riparian areas will also stabilize banks, slow flood flows, and reduce erosion. A continuous river hiking trail connecting adjoining parks to the preserve will provide environmental education opportunities in close proximity to the schools of Ventura, Oxnard, and Santa Paula.

The project is consistent with the consensus recommendations of the recently completed five-year planning effort of the Santa Clara River Enhancement and Management Plan (SCREMP), which included representatives of all of the interest groups on the river. The Plan encourages the purchase of property from willing sellers for the preservation of existing resources and the restoration of degraded habitat. The Coastal Conservancy or its representatives have contacted most of the property owners on the lower river, all of whom have expressed interest in the proposal. Nine properties are considered likely prospects for acquisition this fiscal year.

Initial funding of Santa Clara River Parkway in the amount of \$9.2 million was included in the Coastal Conservancy's FY 2000/01 budget by the Governor and has been appropriated by

the Legislature. The funding source is the 2000 Water Bond. The Conservancy has received a National Coastal Wetlands Conservation Grant from the U.S. Fish and Wildlife Service for the acquisition of estuarine habitat near the river mouth. The project has been selected as a priority project to be funded by the Southern California Wetlands Recovery Project. Also, the Conservancy has applied for a \$5 million grant from the Santa Clara River Trustee Council (U.S. Fish and Wildlife Service and State Department of Fish and Game), which administers oil spill settlement funds to be expended for acquisition and restoration of the river.

The project has been presented to several community interest groups and has been endorsed by the City of Oxnard and City of Ventura Liaison Committee (Exhibit 4). The Coastal Conservancy has been asked by the Cities of Ventura and Oxnard and a coalition of river property owners to take the lead on acquisition and on the formation of a Joint Powers Authority for ultimate management of the public lands.

COASTAL CONSERVANCY

Staff Recommendation  
October 26, 2000

**SANTA CLARA RIVER PARKWAY CONCEPTUAL ENHANCEMENT PLAN  
CAMP ACQUISITION**

File No. 00-105  
Project Manager: Peter S. Brand

STAFF

RECOMMENDATION: Staff recommends that the State Coastal Conservancy adopt the following Resolution pursuant to Sections 31251 *et seq.* of the Public Resources Code:

“The State Coastal Conservancy hereby approves the Santa Clara River Parkway Conceptual Enhancement Plan, attached to the accompanying staff recommendation as its Exhibit 3 (the “Enhancement Plan”), and authorizes disbursement of an amount not to exceed four million eight hundred thousand dollars (\$4,800,000) to The Nature Conservancy for the acquisition of the Camp property on the Santa Clara River, as described in Exhibit 2 of the accompanying staff recommendation, subject to the following conditions:

1. Prior to the disbursement of any funds for this acquisition, the Executive Officer shall review and approve all title and acquisition documents including but not limited to the appraisal, agreement of purchase and sale, escrow instructions and documents of title;
2. The Nature Conservancy shall pay no more than fair market value for the property, as established by an appraisal approved by the Executive Officer;
3. The property shall be permanently protected for public access, open space and habitat conservation in a manner acceptable to the Executive Officer and consistent with the Enhancement Plan and Public Resources Code Section 31116(b);
4. The Nature Conservancy may lease portions of the property currently in agricultural production, on terms and conditions acceptable to the Executive Officer of the Conservancy, pending completion of specific restoration plans and transfer of the property to a

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permanent management entity approved by the Conservancy. Lease revenues shall be returned to the Conservancy and used exclusively for property management and other purposes consistent with the Enhancement Plan; and

5. No funds shall be disbursed until the California Coastal Commission has determined that the Enhancement Plan is in accord with the Division 20 of the Public Resources Code and applicable local coastal programs, pursuant to Public Resources Code Section 31258.”

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed project is consistent with the purposes and criteria set forth in Chapter 6 of the Division 21 of the Public Resources Code (Sections 31241-31270) regarding enhancement of coastal resources;
2. The proposed project is consistent with the interim Project Selection Criteria and Guidelines adopted by the Conservancy on May 27, 1999;
3. The portion of the Santa Clara River that is within the Coastal Zone is identified as a significant and environmentally sensitive resource requiring public action to resolve existing and potential resource problems in the City of Oxnard’s certified Local Coastal Program, in the City of San Buenaventura’s certified Local Coastal Program, and in The California Department of Parks and Recreation’s Plan for McGrath State Beach Natural Preserve; and
4. The Nature Conservancy is a private, nonprofit organization existing under the provisions of Section 501(c)(3) of the United States Internal Revenue Code, and having among its principal charitable purposes the preservation of land for scientific, historic, educational, recreational, agricultural, scenic or open space opportunities.”

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**STAFF DISCUSSION:**

Project Description: Staff recommends that the Conservancy adopt a conceptual enhancement plan for the Santa Clara River Parkway and authorize disbursement of an amount not to exceed \$4.8

million to the Nature Conservancy for the acquisition of the Camp property totaling 220 acres. Acquisition will preserve 70 acres of river and riparian habitat and allow for the restoration of an additional 150 acres of riparian habitat and a trail along one mile of the river. It would be the first step in implementation of the Santa Clara River Parkway Conceptual Enhancement Plan, which recommends acquisition of a continuous estuarine and riverine corridor along the Santa Clara River between the cities of Ventura and Oxnard for habitat preservation and to provide public trail linkages to and along the river and adjacent public lands. The Conservancy has an appraisal on the property and a price to which the landowner has agreed. A grant to the Nature Conservancy will assist in expediting acquisition of the property. The Santa Clara River Valley is one of four core areas that are the focus of the Nature Conservancy's new L.A.-Ventura Project, and the Coastal Conservancy and Nature Conservancy will work together to incorporate the Camp property in the larger Santa Clara River Parkway effort.

The area currently in cultivation would be leased back until additional properties are acquired and restoration planning for the whole reach has been completed. Part of the restoration planning effort will be to provide for removal of the levee on the property, allowing the entire property to be restored as riparian habitat and reconnecting it to the river.

The project is consistent with the consensus recommendations of the recently completed, five-year planning effort of the Santa Clara River Enhancement and Management Plan (SCREMP) which included representatives of all of the interest groups on the river. The Plan encourages the purchase of property from willing sellers for the preservation of existing resources and the restoration of degraded habitat.

The Coastal Conservancy has been asked by the Cities of Ventura and Oxnard and a coalition of river property owners to take the lead on acquisition and the formation of a Joint Powers Authority for ultimate management of the public lands. A grant to the Nature Conservancy will expedite transfer of ownership and provide interim management while a joint powers authority is being formed and specific restoration plans developed for this property and others acquired along the river corridor.

The Camp property is particularly important to the Santa Clara River Parkway concept plan. Not only can former riparian habitat be restored but also the river can be reconnected to its former floodplain. Once the adjoining reaches of the river have been acquired, private levees on the Camp property and others

can be removed, obviating the pressure for pilot channels, resolving longstanding regulatory battles and reducing flood damage to farms and public facilities both up and downstream. Until additional properties have been acquired that will allow for implementation of a restoration plan, the property will be leased back, allowing time for the farmer to transfer his agricultural operations to other land out of the floodplain.

Enhancement plans for the Camp property will consider various measures to enhance existing habitat that is used by many threatened coastal species and restore riparian wetlands that have been converted to agriculture. The expected results will be reduced flooding and non-point source pollution that have damaged resources downstream critical to the ecological health of the coast. The Conservancy is hiring biologists and hydrogeomorphologists to assist in the development of a strategic plan integrating restoration plans for different reaches of the river that can be implemented in coordination with the acquisition program.

Project Financing: Coastal Conservancy                      \$4,800,000

Site Description: The Camp property is generally divided into two parts, the north half in citrus agriculture, and the southern half in riparian floodplain, each separated by a private levee. The vegetation has high structural and habitat diversity and high species richness (a large number of species for its size). In a site visit on October 2, 2000, the Conservancy's biologist observed a total of 78 species of plants onsite, consisting primarily of wetland species.

The natural vegetation consists of Freshwater Marsh, Southern Willow Riparian Scrub, Scalebroom Scrub, and Cottonwood-Willow Riparian Forest. The Freshwater Marsh habitats contains a rich assemblage of wetland plants and wildlife.

Several special-status species occur onsite, or are known to occur nearby. Least Bell's vireo, a state and federally listed migratory songbird is reported to use riparian habitats onsite at the southwestern end of the property. The federally endangered southern steelhead trout uses the riverbed portion of the property as a migration corridor. Santa Ana sucker, a small minnow-like fish, is expected to occur onsite, and the southwestern pond turtle likely inhabits the site.

Twenty-one species of plants observed onsite are considered as species of local concern, each having fewer than ten known occurrences in Ventura County (Magney 2000). This is remarkably high number of species of special concern on one



site. While none of these plants are rare in California as a whole, they can be considered rare locally, *i.e.*, in Ventura County.

The Santa Clara River is the largest river in southern California and one of the last major rivers in the region that exists in a relatively natural state. The Santa Clara originates in the northern slope of the San Gabriel Mountains in Los Angeles County, traverses Ventura County and flows into the Pacific Ocean halfway between the Cities of San Buenaventura and Oxnard. Its total length is approximately 100 miles with its watershed covering approximately 1,200 square miles.

The headwaters of the Santa Clara and all of its major tributaries originate on National Forest lands. The estuary at the river mouth is protected as a natural preserve within McGrath State Beach. The portion of the river in Los Angeles County is designated as a “significant ecological area” by Los Angeles County. While this designation does not convey protective status, it does recognize the biological importance of the upper Santa Clara River. The majority of the main river corridor is privately owned and not protected.

Elevations in the Santa Clara River watershed range from 8,831 feet above sea level on Mount San Piños to sea level at McGrath State Beach. Streamflows into the Santa Clara River are highly variable. Average discharge measured at Montalvo (three miles upstream of the estuary) ranges from no flow for many days during the summer to winter flood flows over 100,000 cubic feet per second. Major floods are common on the Santa Clara, and because the river carries high sediment loads and has a broad migrating channel, flood damage has been extensive. The most damaging flood occurred in January 1969, when a peak flood of 160,000 cubic feet per second jumped the north bank of the river and destroyed the East Side Treatment Plant, Ventura Boat Harbor, and several upstream bridges.

From a biological perspective, the river is unmatched in southern California. Extensive patches of high quality riparian habitat are present along the entire length of the river. These patches serve as “stepping stones” for migratory birds traveling between riparian areas and wetlands on the south coast.

The river is also home to many species in decline throughout the southern California region. The federal listed endangered least Bell’s vireo and unarmored threespine stickleback are two such species. Projections in the draft recovery plan for the vireo indicates that approximately 4,500 acres of riparian

habitat on the Santa Clara River could support 625 territorial male vireos, more than any other southern California river, making the Santa Clara the site for a new population stronghold. Likewise, two reaches of the river in Los Angeles County are designated as essential habitat for the stickleback. Without these areas, the sticklebacks, vireos, and the other endangered or candidate species (*e.g.*, least tern, tidewater goby, *etc.*) will face localized extinction and possible extirpation from the region.

The Santa Clara River is a highly dynamic system susceptible to episodic flood events, most recently in 1969, 1978, and 1995. Natural processes such as flooding and fire, and historic land use practices such as grazing, agriculture, urban development, and aggregate mining have influenced the geomorphic characteristics of the watershed. Use of the watershed has changed from grazing to agriculture and urban development in Los Angeles and Ventura Counties over the past two centuries. In the 1900s the trend of narrowing the river for agricultural land reclamation and increasing urban development up to the river banks have created a narrower river/riparian corridor with a greater potential for erosion damage. Local efforts at bank stabilization have required frequent maintenance and raised concerns that the methods used for channel stabilization at one location could be aggravating bank erosion at another location.

With the exception of the mouth (McGrath State Beach), headwaters, and tributaries (National Forests), the river is all privately owned. Access to the main river corridor is very limited and difficult.

**Project History:** In August 1992 the Coastal Conservancy authorized the disbursement of \$200,000 as part of a \$710,000, 11-agency program to develop an enhancement and management plan for the Santa Clara River watershed. Nine main categories were identified to be the basis of the study: agriculture, aggregate extraction, biological resources, cultural resources, development, flood control, public access and recreation, transportation, and water supply. Additionally, protecting property rights and standardizing regulatory procedures were important sub-topics. The Management Plan Project Steering Committee has contracted for and produced ten reports on the history and resources of the river as well as a GIS mapping program for the river corridor.

The Conservancy has authorized disbursement of \$140,000 for the preparation of CEQA documentation and related

environmental studies and analyses necessary to the completion of the Santa Clara River Enhancement and Management Plan. The County of Ventura and the County of Los Angeles have committed \$100,000 to match the proposed Conservancy contribution.

The management plan resource reports and proposed recommendations now need to be analyzed for their potential environmental impacts and redrafted and synthesized into a final report. Further studies will be done to assess the feasibility of specific restoration measures that could be undertaken following adoption of the plan. The revised and refined enhancement plan, along with the CEQA documents will then be presented to the Conservancy and many of the participating agencies for their consideration and possible approval or adoption.

In 1996, the Conservancy in conjunction with its plan partners determined that demonstration projects were urgently needed to show the feasibility of streambank stabilization using biotechnical techniques. After studies of alternate sites and methods, Valley View Ranch near Santa Paula was selected. An enhancement plan was prepared and approved for reach five of the river, including this property. The Conservancy authorized phased acquisition of the ranch in 1997. The Conservancy, the owner, and Friends of the Santa Clara River continue to work together to complete permitting and acquisition documents required for the sale and transfer.

Three properties at the mouth of the Santa Clara River and at the adjoining McGrath Lake have been recommended for acquisition in the draft river enhancement and management plan and in the McGrath State Beach General Plan. On August 20, 1998, the Conservancy authorized an appraisal of these properties, which will be complete in October 1999. The Lower Santa Clara River Parkway Conceptual Enhancement Plan recommends acquisition of properties along the estuarine and riverine corridor as they become available; acquisition of the Camp property would initiate this effort and complement the SCREMP

**PROJECT SUPPORT:** The Santa Clara River Enhancement and Management Plan has the support of Assemblyman Jack O'Connell, the City of Santa Clarita, the City of Fillmore, the City of Santa Paula, the City of San Buenaventura, the Ventura County Resource Conservation District, the United Water Conservation District, U.S. Fish and Wildlife Service, CalTrans, the Coastal

Commission staff, the California Department of Fish and Game, the Angeles National Forest, the Los Padres National Forest, the Ventura County Farm Bureau, the sand and gravel industry, the State Parks Foundation, the Nature Conservancy, and the Audubon Society. Letters of support are included in Exhibit 4, and additional letters will be hand-carried to the Conservancy meeting.

CONSISTENCY WITH  
CONSERVANCY'S  
ENABLING LEGISLATION:

This project is undertaken pursuant to the Conservancy's enabling legislation, Division 21 of the Public Resources Code; in particular Chapter 6 (Public Resources Code Sections 31251-31270).

Consistent with Section 31251, the Conservancy may award grants to public agencies and nonprofit organizations for the enhancement of coastal resources that have suffered losses of natural and scenic values as a result of human actions. Grants under this chapter may be used for the assembly of parcels of land within coastal resource enhancement areas to improve resource management, for relocation of improperly located or designed improvements and for other corrective measures, all of which are contemplated by the Lower Santa Clara River Conceptual Enhancement Plan. The grant of funds to the Nature Conservancy for acquisition of the Camp property is consistent with Section 31251, which provides that the cost of acquiring lands within coastal resource enhancement areas may be funded through the Conservancy.

Pursuant to Section 31251.2, in order to enhance the natural character of coastal resources within the coastal zone, the Conservancy may undertake a project or award a grant to enhance a watershed resource partly outside the coastal zone. The Santa Clara River Parkway project will result in improved coastal resource management and will enhance the natural and scenic character of the river and its watershed. The Santa Clara River has suffered a loss of habitat values as a result of land use and flood control practices. Unless alternatives are developed that reduce these losses, habitat will continue to degrade.

Consistent with Section 31252, the tidal portion of the Santa Clara River is identified in the City of San Buenaventura's certified Local Coastal Program as needing public action to resolve existing and potential resource problems. The inland portions of the river also are identified in the Ventura County Certified Local Coastal Program, the Los Angeles County, City

of Santa Clarita, City of Santa Paula, and City of Fillmore General Plans as a significant ecological resource in need of public action to resolve existing and potential resource problems. The Santa Clara River Parkway project would address existing and potential resource problems and craft long-term solutions for resolving these problems. Consistent with Section 31258, the Enhancement Plan will be forwarded to the Coastal Commission for review, because it involves areas both within the Commission's retained jurisdiction and areas in which two or more local governments have jurisdiction.

Consistent with Section 31253, the level of Conservancy funding for this project has been determined through consideration of the total amount of funding available for coastal resource projects, the relative urgency of the project, and other factors prescribed by the Conservancy, as detailed below.

CONSISTENCY WITH  
CONSERVANCY'S  
PROGRAM GUIDELINES:

The proposed project is consistent with the Conservancy's interim Program Guidelines adopted May 27, 1999, in the following respects:

**Required Criteria**

**Promotion of the Conservancy's statutory programs and purposes:** see above.

**Consistency with the purposes of the funding source:** The project would draw on a nine million dollar appropriation to the Conservancy of funding from the River Protection Subaccount of the Safe Drinking Water, Clean Water, Watershed Protection and Flood Protection Act of 2000 (Proposition 13) that is specifically designated for the Santa Clara River Parkway. The River Protection Program provides for acquisition and restoration of riparian habitat, riverine aquatic habitat, and other lands in close proximity to rivers and streams and for river and stream trail projects undertaken in accordance with among other things the statutory provisions of Chapter 6 of Division 21, the Conservancy's enabling legislation.

**Support:** The project is supported by the federal and state resource agencies and local governments and resident representatives in the watershed.

**Location:** The project advances the objectives of planning for and restoring the natural resources of a coastal watershed. The project area is outside the coastal zone but will have direct beneficial impacts on the river's coastal resources.

**Need:** While acquisition was identified as an implementation strategy in the Santa Clara River Enhancement and Management Plan, the Coastal Conservancy is the only entity that has been able to secure the necessary funds.

**Urgency:** There are 28 species of special concern on the Santa Clara River. Much of the habitat along the river has either been converted to other uses or is degraded due to flooding and pollution. Agricultural lands along the river, among the most productive in the nation, are endangered by severe flooding that is increasing due to development. Newhall Land and Farming has recently received development approvals for approximately 6,000 acres of its 12,000-acre holdings in Los Angeles County. Newhall owns 15,000 acres in Ventura County downstream from its current development and is considering future development of these lands along the Santa Clara River.

#### **Additional Criteria**

**Greater-than-local-interest:** The Santa Clara River was selected by a federal task force as one of the top 11 rivers in the country for its American Heritage River designation.

**Resolution of more than one issue:** The enhancement plan will help resolve several issues including flood management, habitat loss, sedimentation, erosion, water quality impairments, recreation, and mining.

**Leverage:** Conservancy funding is expected to leverage \$5 million of oil spill settlement funds for allocation to the Santa Clara River Parkway project.

**Cooperation:** All of the federal and state resource agencies and local jurisdictions and landowner group representatives have participated in the planning process.

#### **CONSISTENCY WITH THE COASTAL ACT:**

The proposed project would be consistent with the following specific policies of the Coastal Act:

Public Resources Code Section 30231 states that the "biological productivity and the quality of coastal waters, streams, wetlands, estuaries and lakes appropriate to maintain

optimum populations of marine organisms . . . shall be maintained and, where feasible, restored. . . .”

Public Resources Code Section 30240 states that “environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.”

The City of San Buenaventura, City of Oxnard, and the County of Ventura’s certified Local Coastal Programs identified the Santa Clara River as an environmentally sensitive resource that should be protected and restored.

#### COMPLIANCE

WITH CEQA: The Santa Clara River Conceptual Enhancement Plan recommends acquisition and further planning to develop riparian restoration opportunities on the properties along the lower river corridor. Acquisition of the Camp property and others would be categorically exempt from review of environmental impacts under the California Environmental Quality Act because the transfer of ownership or interest in land is for the purpose of preserving open space (14 California Code of Regulations Section 15325) and for wildlife conservation purposes (14 California Code of Regulations Section 15313). The replanning, feasibility studies, and property studies recommended by the Enhancement Plan are statutorily exempt (14 California Code of Regulations Section 15262). Wetland restoration and management plans will consider environmental factors and will be subject to CEQA review and analysis prior to implementation. Staff will file a Notice of Exemption with regard to acquisition of the Camp property and other actions recommended in the Enhancement Plan following Conservancy authorization.

